

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES LIDESTRI,

25 Civ. 1166 (JHR)

Plaintiff,

-v.-

AUDREY BURNS,

Defendant.

-----x
DECLARATION OF
BOBBY DOBBS

Bobby Dobbs hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a licensed private investigator in the state of Oklahoma.
2. This declaration is respectfully submitted to show that the Defendant is a citizen of Oklahoma.
3. After being hired by Plaintiff's counsel, I confirmed that Ms. Burns was issued a Social Security number, indicating that she is likely a U.S. citizen.
4. On March 1, I determined that Ms. Burns lived at 709 S. Silver Leaf Drive in Moore, Oklahoma. I went to that address and saw that a vehicle parked there had a temporary Oklahoma license plate in the name Audrey Burns, a photo of which is attached as **Exhibit 1**. The temporary license plate indicated that the vehicle was purchased from a used car dealer, Elite Wholesale Auto, which is located at 3106 W. University Blvd, Durant, Oklahoma.
5. On the evening of March 4, 2025, I attempted to serve Ms. Burns with the Summons and Complaint in this matter at the above-mentioned address. Her sister, Amanda Burns, accepted service on her behalf. Amanda Burns and I had a conversation during which Amanda Burns confirmed that Audrey Burns lived at the address.

6. On March 9, 2025, I searched Oklahoma motor vehicle records and found that Audrey Burns had permanently registered the vehicle that had the temporary Oklahoma license plate.

7. On March 10, 2025, I secured the official vehicle registration information listing Audrey Burns as the registered owner of the vehicle in question, along with her address, which is the address where I served the Summons and Complaint. **Exhibit 2**. Based upon the fact that the vehicle was purchased from a used car dealer, the address on the registration would be the address Audrey Burns had provided to the dealer as her address during the purchase process. Audrey Burns would have been required to provide proof of that address to the dealer by showing the dealer her driver's license. Therefore, her driver's license also showed the above Oklahoma address.

8. Based upon all of the information above, I concluded that Audrey Burns is a citizen of Oklahoma.

Dated: March 18th 2025



Bobby Dobbs